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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDREW RORIGUEZ, and  
ANDREW MADRID,

Defendants.

CASE NO. 1:23-CR-00102-TLN-BAM

**STIPULATION TO CONTINUE STATUS  
CONFERENCE AND EXCLUDE TIME; AND  
ORDER**

The parties stipulate as follows:

1. A federal grand jury indicted seven defendants on August 31, 2023, charging them with seventeen drug and gun related counts in a superseding indictment. Of those seven defendants, only defendants Andrew Rodriguez and Andrew Madrid remain in this case. Defendant Rodriguez is detained, and defendant Madrid is out of custody. Presently, a status conference is set on November 12, 2025, with time excluded to that date.

2. On July 5, 2023, the government produced initial discovery and has produced supplemental discovery.

3. The Government extended plea offers to the remaining defendants. Neither defendant accepted the plea offer.

4. On August 12, 2025, Defendant Rodriguez's attorney withdrew, and attorney John Garland

1 filed a notice of appearance. ECF 246. The Court continued the September 10, 2025, status conference to  
2 November 12, 2025, to allow Mr. Garland time to review discovery. No trial date is set.

3 5. Now, the parties have met and conferred and agreed to continue the status conference from  
4 November 12, 2025, to January 14, 2026, to further provide defendants with reasonable time necessary  
5 for effective preparation, so that the defendants can review the discovery, and for defendants to consider  
6 a pre-trial resolution of the case.

7 6. The parties understand that they will appear at the next status conference to set this case  
8 for trial if no resolution has been made by then.

9 7. The parties agree that the interests of justice served by granting this continuance outweigh  
10 the best interests of the public and the defendant in a speedy trial. The parties also agree that the period  
11 from November 12, 2025, through January 14, 2026, should be excluded. Fed. R. Crim. P. 17.1; 18 U.S.C.  
12 § 3161(h)(7)(A) and (h)(7)(B)(iv).

13 IT IS SO STIPULATED.

14 Dated: November 6, 2025

ERIC GRANT  
United States Attorney

16  
17 /s/ Cody Chapple  
Cody Chapple  
Stephanie M. Stokman  
Assistant United States Attorney

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19  
20 Dated: November 6, 2025

/s/ Robert Conrad Lamanuzzi  
Robert Conrad Lamanuzzi  
Law Offices of Robert C Lamanuzzi  
Counsel for ANDEW MADRID

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23  
24 Dated: November 6, 2025

/s/ John Frederick Garland  
John Frederick Garland  
Law Office of John Garland  
Counsel for ANDREW RODRIGUEZ

**ORDER**

The Court has read and considered the parties' stipulation to further continue the status conference and exclude time. The Court finds there is good cause for the continuance so as to allow the defendant reasonable time to complete his review of the discovery and fully consider a pre-trial resolution of the case. The Court also finds that the interests of justice served by granting the continuance outweigh the interests of the public and the defendant in a speedy trial.

If the parties do not resolve the case in advance of the next status conference, they shall be prepared to set a trial date at the status conference hearing.

Therefore, for good cause shown:

1. The status conference is continued from November 12, 2025, until **January 14, 2026, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe**; and
2. The period from November 12, 2025, through January 14, 2026, shall be excluded pursuant to Fed. R. Crim. P. 17.1; 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

IT IS SO ORDERED.

Dated: November 6, 2025

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE